

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

SUNG KOOK (BILL) HWANG and
PATRICK HALLIGAN,

Defendants.

22 Cr. 240 (AKH)

DECLARATION OF MICHAEL
MARTINEZ IN SUPPORT OF
DEFENDANT BILL HWANG'S OMNIBUS
MOTIONS *IN LIMINE*

I, Michael Martinez, an attorney duly admitted to practice before this Court, hereby declare, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, as follows:

1. I am a partner at the law firm of Kramer Levin Naftalis & Frankel LLP, counsel for Defendant Bill Hwang in the above-captioned matter.

2. I submit this Declaration to provide the Court with documents and information pertinent to Mr. Hwang's Omnibus Motions *in Limine*.

3. To the best of my knowledge, information, and belief, the exhibits to this Declaration are true and correct copies of the following documents.

4. Exhibit A is a copy of a March 22, 2021 email produced by Nomura, which was produced at Bates Number SDNY_P002_0000431860.

5. Exhibit B is a copy of an excerpt of an FBI 302 Report of an April 25, 2022 Interview of Scott Pecullan of Morgan Stanley, which was produced as number 3557-001.

6. Exhibit C is a copy of an excerpt of an FBI 302 Report of a December 14, 2023 Interview of Andrew Vaccaro of Jefferies, which was produced as number 3577-001.

7. Exhibit D is a copy of government exhibit GX-2946, which was produced at Bates Number SDNY_P002_0000061351.

8. Exhibit E is a copy of government exhibit GX-2918, which was produced at Bates Number SDNY_P002_0000060693.

9. Exhibit F is a copy of government exhibit GX-2915, which was produced at Bates Number SDNY_P010_0000000001 (lines CHUANG_0262485 – CHUANG_0262489).

1. Exhibit G is a copy of government exhibit GX-0102,¹ which was produced at Bates Number SDNY_SWR_0000382882.

2. Exhibit H is a copy of government exhibit GX-3070, which was produced at Bates Number SDNY_SWR_0000004087.

Dated: New York, New York
March 21, 2024

/s/ Michael Martinez
Michael Martinez

¹ GX-0102 was produced without an exhibit sticker.